

# United States Country Comments

## Pest Reporting

10/29/01

General: The United States generally accepts this standard, however, there are a number of issues that we would like to see clarified before this standard is finalized.

### Specific Comments:

#### SCOPE

**Comment** – At the second bullet change to read, “pest free status, including:”.

#### DEFINITIONS AND ABBREVIATIONS

**Comment** – For “Occurrence” we do not believe that the terms “indigenous” and “introduced” are important. We suggest the wording be, “The official recognition of the presence of an established pest.”

**Comment** – For the term “Outbreak” this is different than what is in ISPM 8. The part about “and expected to survive for the immediate future” has been dropped. Was this intentional? Is it an outbreak if it is newly introduced and eradication is underway? What is the time period for an outbreak? Is it when the pest is first detected or can you have an outbreak that is under eradication? Also, can you use this term for the situation when a pest is present in a country and spreads to a new part of the country? How does this differ from “Spread”? These issues should be addressed in the definition.

**Comment** – For the term “Surveillance”, the current definition is not clear. We suggest the following wording, “An official process where data on pest occurrence or absence is collected by means of survey monitoring or other procedures.”

**Comment** – We would like to see a distinction between reporting the occurrence of pests and reporting the outbreak and spread of pests. We believe the occurrence of pests should be dealt with on a bilateral basis on a commodity basis to support PRAs. Otherwise a country would need a complete listing on all the pests that occur in their country. Not too many countries could do this. We suggest the following changes:

“The New Revised Text of the IPPC requires countries to report on the occurrence, outbreak and spread of pests within their country, with the purpose to communicate immediate or potential danger. National plant protection organizations (NPPOs) have the responsibility to collect pest information and verify the pest records thus collected. The occurrence, (i.e. what is currently present in your country) of pests should be exchanged on a bilateral basis for the purpose of conducting PRAs when a specific commodity

import is requested. An occurrence of a pest, however, should be reported when it has been present, but recently detected. If there is an outbreak or spread of pests that are known, on the basis of observation, previous experience or previous PRAs to be of immediate or potential danger, then the outbreak or spread should be reported to other countries. It is particularly important to report such situations to neighboring countries and trading partners. It is, however, recommended that this information be made available to all contracting parties. Reports of successful eradication and the establishment of pest free areas also should be provided. Acceptance of these reports may need to be confirmed bilaterally. Pest reports should contain information on the identity of the pest, location, pest status and, if appropriate, the nature of the immediate or potential danger. Reports should be provided in a timely manner through the mechanisms identified in this standard.”

**Comment** – In 2. Purpose of Pest Reporting, change the first sentence to read, “The main purpose of pest reporting is to advise countries of a change in the pest status in your country. It is especially important to report a change where there is an immediate or potential danger to a neighboring country or a trading partner.” This change emphasizes that it is important to report on the “change of pest status” and then goes on to say when this reporting is most important.

**Comment** – The second sentence is true, but what if a country does not have a reliable system? Should they be penalized or challenged? This sentence alone is lacking substance.

**Comment** – In the third paragraph there is a mixture of benefits to importing and exporting countries, but that is not made clear. We suggest the following rewording:

“Pest reporting enables importing countries to adjust their phytosanitary requirements and actions to take account of changes in risk. Pest reports provide up-to-date information on pest status. Accurate pest status information minimizes interference with trade. Countries need pest reports for this purpose, but should not overreact to pest reports. Phytosanitary measures should be commensurate with the risk.

Accurate information on pest status in an importing country also facilitates technical justification of phytosanitary measures for imported commodities.”

**Comment** – In 3., change the first sentence to read, “Countries should have a surveillance system in place to ensure .....”.

**Comment** – In 3.1, delete “within countries” in the first sentence. Wording is redundant. In the fourth sentence delete “be put in place” to , “such” and replace “passed” with the word “sent”.

**Comment** – In 3.2, to clarify the sentence change the first sentence to read, “Pest reporting information may be obtained directly by the NPPO or the NPPO may make

available information from a variety of other sources .....”. Last sentence change to read, “This may include information .....”.

**Comment** – In 3.3, the third sentence needs to be clearer. We suggest the following change, “The NPPO should do an analysis to determine whether the outbreak or spread of the pest constitutes an immediate or potential threat domestically and if phytosanitary action is needed. This analysis also may be used to identify, as appropriate, whether the reported situations may be of potential concern to other countries.”

**Comment** – In 3.4 Motivation for reporting, we would like to see this strengthened. In most cases there is a definite motivation by growers to not report since many countries respond in a severe manner (e.g. stopping the export of the commodity). Such actions do not motivate growers to report. Tempered responses would go a long way in getting cooperation from growers and other concerned parties. Because many countries find it an advantage to not report on pests that are widely distributed in their country we suggest adding a new point as follows:

#### “3.5 Challenge to Pest Status

If the pest status of a country is questioned by another country then the matter should be discussed on a bilateral basis. Joint surveys or other bilateral actions may be necessary to resolve the discrepancies. If the issue can not be resolved then it may be brought to the IPPC for dispute resolution.”

We believe that it is critical to include this new point.

**Comment** – In 4, we suggest the following rewording, “The obligation identified under the IPPC is to report the occurrence, outbreak and spread of pests that may be of immediate or potential danger. Countries, at their discretion, may make other pest reports available. This optional reporting satisfies the general recommendations under the IPPC to cooperate in achieving the objectives of the Convention of preventing the spread of plant pest, but is not a specific obligation. This standard considers both types of pest reporting mentioned above.” This removes some vagueness from the paragraph.

**Comment** – In 4.1, we suggest the third sentence be changed to read, “Both immediate and potential danger of a pest found in the reporting country normally lead to phytosanitary or emergency action in that country.” This makes it clearer that the detections and actions are taking place in the reporting country.

In the third paragraph, last sentence, change to read, “This will normally concern only neighboring countries, because the pest could spread without trade taking place, and trading partners (for relevant pathways).”

**Comment** – In 4.3, we suggest adding a second sentence, “However, if the pest has not been reported by the country as being present, this notifies the country that its pest status may be incorrect and requires investigation. Failure to conduct an investigation could

result in the reporting country taking action on that pest for all host material being imported from that country.” This is an important feedback system that affects a pest’s status and should be included in the standard.

**Comment** – In 5, change to read, “Pest reports are initiated by the occurrence, outbreak, spread, or successful eradication of pest, or any other new or unexpected pest situation.”

**Comment** – In 5.1, we suggest the following changes, “Occurrence should be reported when the pest has been present but is only newly discovered. If the pest is known to be regulated by neighboring countries or trading partners (for relevant pathways), then it poses immediate or potential danger.”

**Comment** – In 5.3, how does Spread differ from Outbreak in a new area of a country? Maybe Outbreak should only refer to new introductions of pests.

**Comment** – In 5.4, change to read, “Eradication is reported only when successful. Success occurs when an established or transient pest is eliminated from an area and the absence of that pest is verified.” This simplifies the sentence.

**Comment** – In 6, add a new 6.1 entitled, “Who should report”. Under this heading add, “It is the responsibility of the NPPO to provide pest reports.”

**Comment** – In the current 6.1 add a new paragraph, “If all the information is not available on the pest situation then a preliminary report should be made and updates made as further information becomes available.”

**Comment** – In the last paragraph of 6.1 add, “which mitigates risk to trading partners” after “required”.

**Comment** – In 6.2, change “without undue delay” to “in a timely manner”. This makes the wording consistent with other standards.

**Comment** – In 6.3, just posting pest reports to a web site is too passive. The standard should require direct communication for pests of immediate or potential danger. To reflect this idea, we suggest the following:

Add two new headings –

“For pests of immediate or potential danger

- direct communication to countries, through official contact points

More in-dept information on the pest report can be provided on national websites or on the International Phytosanitary Portal.

For all other pest reporting

- publication on an openly available national .....

- the International Phytosanitary Portal “

**Comment** – All the information in 7 could be moved under 6.3 since it relates to that topic. Maybe the title of 6.3 could be changed to, “Timing and mechanisms of reporting”.

**Comment** – In 7, add the following to the last sentence, “because they would not be timely and official”.

**Comment** – In 8, delete “to the best of its ability”. Current sentence is too wordy.